

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SCANSOFT, INC.,

Plaintiff,

v.

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR,

Defendants.

C.A. No. 04-10353-PBS

AFFIDAVIT OF DANIEL ROTH

I, Daniel Roth, on oath, depose and say as follows:

I am President of Voice Signal Technologies, Inc. ("Voice Signal"). I make this affidavit in connection with Voice Signal Technologies, Inc.'s Reply Memorandum in Support of Defendant Manfred G. Grabherr's Motion for Summary Judgment.

1. I am co-founder, with Tom Lazay, of Voice Signal. We founded the company in 1995 just after graduation from college. Voice Signal is more than 70 people today. Because of its highly proprietary innovations, Voice Signal is the leading provider of voice recognition interfaces for mobile phones for several of the world's largest manufacturers, including Motorola, Samsung, Nokia, Curitel, Panasonic and Palm.

2. Voice Signal's dictation products do not contain a function for removing "ums and ahhs" spoken by users.

3. Voice Signal's dictation products do not contain a function for recognizing voice commands while dictating.

4. Voice Signal's dictation products do not interact or contain any function that can interact with any PC word processing applications, or Microsoft Windows.

Signed under the pains and penalties of perjury this _____ day of June, 2005.

A handwritten signature in black ink, appearing to read "Daniel Roth", written over a horizontal line.

Daniel Roth